U.S. Department of Homeland Security

Region VIII Denver Federal Center, Building 710 P.O. Box 25267 Denver, CO. 80225-0267



R8 - FIMD

December 23, 2004

DEC 3 O 2004

DISASTER & EMERGENCY SERVICES

STATE OF MONTANA

Daniel McGowan, Administrator Division of Disaster and Emergency Services 1900 Williams Street Helena, MT 59604-4789

Reference:

PLAN APPROVAL - POWELL COUNTY

MULTI-HAZARD MITIGATION PLAN

Dear Mr. McGowan:

We are pleased to announce the Powell County multi-hazard mitigation plan is approved. We wish to thank all jurisdictions that participated in the process. Powell County is now eligible for Pre-Disaster Mitigation project funds appropriated beginning in fiscal year 2004. This plan will be filed in the NEMIS database until the mandatory update is required in five years.

We trust this planning process has raised the county's risk awareness and identified future mitigation projects that can be quickly implemented as funding becomes available.

Congratulations to you and your staff for assisting local communities, and making pre-disaster mitigation planning work in your state.

Sincerely,

David I. Maurstad Regional Director

Enclosure

cc: Larry Akers, SHMO

LOCAL HAZARD MITIGATION PLAN REVIEW FEMA REGION VIII

POWELL COUNTY, MONTANA

Instructions for using the attached Crosswalk Reference Document for Review and Submission of Local Mitigation Plans to the State Hazard Mitigation Officer and FEMA Regional Office

Attached is a crosswalk reference document, which is based on the Final Draft Report **State and Local Plan Interim Criteria Under the Disaster Mitigation Act of 2000**, published by FEMA HQ and dated July 11, 2002. This document was based on the **Disaster Mitigation Act of 2000** (P.L. 106-390), enacted October 30, 2000 and 44 CFR Parts 201 and 206 Interim Final Rule, published February 26, 2002.

The purpose of the crosswalk is to provide a tool to local jurisdictions in developing and submitting Mitigation Plans under Section 322 of the Disaster Mitigation Act of 2000. The crosswalk can be used to assist local or multi-jurisdiction entities in the process of developing and reviewing Local or Multi-jurisdictional plan(s). Each Local or Multi-jurisdictional plan should be reviewed by the pertinent local jurisdictional entity prior to submitting the plan to the respective State. In addition as stated in the Interim Final Rule §201.6(d)(1) "Plans must be submitted to the State Hazard Mitigation Officer for initial review and coordination. The State will then send the plan to the appropriate FEMA Regional Office for formal review and approval." The local jurisdiction must fill out column 3 prior to submitting the plan for formal review and approval.

Tribes may submit hazard mitigation plans through their respective states or they can directly submit their plans to FEMA Region VIII. This means they can write a Local or Multi-jurisdictional Plan as a sub-grantee or they may write a Standard or Enhanced State Plan as a Grantee. When tribes are considering how they want to develop and submit their plans, they need to consider whether or not they want to be Grantees directly from FEMA or Sub-grantees through their respective states. The deciding factor would be how they want to apply for and receive Pre-disaster Mitigation Grant projects, Hazard Mitigation Grant Program projects, or Flood Mitigation Assistance projects. Interested tribes can determine this by talking with their State Hazard Mitigation Officer or their respective FEMA Regional Federal Insurance and Mitigation Administration (FIMA) Division. In any case, each tribe should review their own plans before submitting them to their state or FEMA Regional office.

Following are explanations of each column.

- Column 1 indicates on what page or pages in the State and Local Plan Interim Criteria document more detailed information can be found regarding the requirements.
- Column 2 references and directly quotes the 44 CFR Parts 201 and 206 Interim Final Rule.
- Column 3 is for the tribe and/or local jurisdiction to indicate the Section or Annex and the page number(s) in their plan where the requirement
 is addressed.
- Column 4 provides space for State/FEMA comments and for scoring of the plan.

Local Mitigation Plan Review and Approval Status

Local Requirement				
Local Plan Submitted to the State by:	Title:	Date:		
Ron Hanson	Powell County Planner	August 13, 2004		
State Requirement				
State Reviewer:	Title:	Date:		
Larry Akers	shmo	October 15, 2004		
FEMA Requirement				
FEMA Reviewer:	Title:	Date:		
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Wade Nofziger	Hazard Mitigation Specialist	December 6, 2004		
Marty Kientz	Hazard Mitigation Specialist	December 6, 2004 October 25, 2004		
		December 6, 2004		
Marty Kientz K C Collins	Hazard Mitigation Specialist Planner	December 6, 2004 October 25, 2004		
Marty Kientz	Hazard Mitigation Specialist Planner	December 6, 2004 October 25, 2004		
Marty Kientz K C Collins	Hazard Mitigation Specialist Planner	December 6, 2004 October 25, 2004		
Marty Kientz K C Collins Date Received in FEMA Region VIII	Hazard Mitigation Specialist Planner October 20, 2004	December 6, 2004 October 25, 2004		

Point of Contact: Ron Hanson Title: Powell County Planner Agency:	Local Plan Reviewed by: Larry Akers Title: SHMO NFIP Status (Single Jurisdiction)					
Powell County, Montana		NFIP Status (Singl	e Jurisdiction)			
Phone Number: 406-846-3680		Participating	Non-Participating			
Multi-jurisdiction: ⊠ YES □ NO (If yes, list each jurisdiction below:)	N/A* NFIP Status (for mapped communities)					
1. Powell County (mapped 9/30/94 – NFIP Good Standing)		Participating 🖂	Non-Participating			
2. City of Deer Lodge (mapped 4/15/81 – NFIP Good Standing)		Participating 🖂	Non-Participating			
3.		Participating	Non-Participating			
4.		Participating	Non-Participating			
5.		Participating	Non-Participating			
6.		Participating	Non-Participating			
7.		Participating	Non-Participating			
8.		Participating	Non-Participating			
9.		Participating	Non-Participating			
[ATTACH PAGE (S) WITH ADDITIONAL JURISDICTIONS]						

Local Plan POC:

Please complete the information requested on this profile form. The form will be submitted with your plan to the State. Using the attached crosswalk, compare your local plan content with the criteria outlined. Please note under the column heading "Location in the Plan" the page(s) where your plan addresses/meets the criteria. Thank you.

^{*} Not applicable for communities not mapped and/or who do not have an identified flood risk.

LOCAL MITHGATION PLANSUM ARY WORKSHEETILE

The plan cannot be reviewed if the <u>prerequisite</u> is not met for a single jurisdictional plan, or <u>prerequisites</u> are not met for a multi-jurisdictional plan.

All mandatory criteria, except those highlighted in gray, must receive a score of "Satisfactory" or "Outstanding" for the plan to receive FEMA approval. A less than "Satisfactory" score on subsections highlighted in gray will not preclude the plan from passing. Reviewer's comments must be provided for requirements receiving a "Needs Improvement" score.

SCORING SYSTEM

Please check one of the following for each requirement.

- U Unsatisfactory: The plan does not address the criteria.
- N Needs Improvement: The plan addresses the criteria, but needs significant improvement. Reviewer's comments must be provided.
- S Satisfactory: The plan meets the minimum criteria. Reviewer's comments are encouraged, but not required.
- O Outstanding: The plan exceeds the minimum criteria. Reviewer's comments are encouraged, but not required.

Prerequisite (s) (Check Applicable Box)		MET	М	ET
Adoption by the Local Governing Body: §201.6(c)(5) OR			N	I/A
Multi-jurisdictional Plan Adoption: §201.6(c)(5) AND				s
Multi-jurisdictional Participation: §201.6(a)(3)				s
Planning Process	U	N	S	0
Documentation of the Planning Process: §201.6(c)(1)			S	
Risk Assessment	U	N	s	0
dentifying Hazards: §201.6(c)(2)(i)			S	
Profiling Hazard Events: §201.6(c)(2)(i)			S	
Assessing Vulnerability: Overview: §201.6(c)(2)(ii)			S	
Assesing Vulnerability) dentitying Assets s2016(8)(2)(ii)(A)		N	7.1	
Assessing/Vulnerability/Estimating/Potential/ Libessess(V0.0(c)(2)(i)(B));		Į.		
Assessing Vulnerability: Analyzing:Developments Trends \$201.6(c)(2)(ii)(0)	17.		$/ \Im i ^2$	
Multi-juris dictional Risk Assessment: §201.6(c)(2)(iii)			S	

Mitigation Strategy	U	N	S	0	
Local Hazard Mitigation Goals: §201.6(c)(3)(i)			S		
Identification and Analysis of Mitigation Measures: §201.6(c)(3)(ii)			s		
Implementation of Mitigation Measures: §201.6(c)(3)(iii)			s		
Multi-jurisdictional Mitigation Strategy: §201.6(c)(3)(iv)			S		
Plan Maintenance Procedures	U	N	s	0	
Monitoring, Evaluating, and Updating the Plan: §201.6(c)(4)(i)			S		
Implementation Through Existing Programs: §201.6(c)(4)(ii)			S		
Continued Public Involvement: §201.6(c)(4)(iii)			S		
Additional State Requirements*	U	N	S	0	
Insert State Requirement					
Insert State Requirement					
Insert State Requirement					
LOCAL MITIGATION PLAN APPROVAL STA PLAN N		ROVE) <u> </u>		
PLAN APPROVED XXX					

See Reviewer's Comments

^{*}States that have additional requirements can add them in the appropriate sections of the *Plan Review Criteria* or create a new section. States need then modify this worksheet to record the score for those requirements.

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #) PREREQUISITE (S) (3-1)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORING MET/NOT UUNSA	STATE / FEMA REVIEWE G SYSTEM T MET (FOR PREREQUISI TISFACTORY S IMPROVEMENT NOTE: The prerequisite case of multi-jurisdiction before the plan can be a	TE (S) ONLY) SSATISFACTORY OOUTSTANDING e, or prerequisites in the nal plans, must be met
Adoption by the Local Governing Body (3-2)	Requirement §201.6(c)(5): [The local hazard mitigation plan shall include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council)			N/A	
OR Multi-Jurisdictional Plan Adoption (3-3)	Requirement §201.6(c)(5): For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.	Appendix A	S	Resolutions by all jurisdic	tions were provided.
Multi-Jurisdictional Planning Participation (3-4)	Requirement §201.6(a)(3): Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process Statewide plans will not be	Page II-1	S	It is clear that a substantial process was undertaken, a total of 23 people repressive governments, businesses were involved in the process.	and it is documented that senting local , and interested citizens

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #) PLANNING PROCESS (3-5)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201 accepted as multi-jurisdictional plans.	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORIN MET/NC UUNS	/ STATE / FEMA REVIEW IG SYSTEM OT MET (FOR PREREQUIS ATISFACTORY DS IMPROVEMENT	
Documentation of the Planning Process (3-6)	Requirement §201.6(c)(1): [The plan must document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.	Pages II-1 and II-2	S	The planning process was steps that were taken to provided. A good job was information for the meeting Cottonwood Creek – Figure Good job of including a coon PDM planning dated 6	develop the plan were us done providing ng held regarding ure 2-1. The plan did a opy of a newspaper article
(3-9)					
Identifying Hazards (3-10)	Requirement §201.6(c)(2)(i): [The risk assessment shall include a] description of the typeof all natural hazards that can affect the jurisdiction	Pages III-1, III-8	S	for Powell County and Do down the number based plan does a good job of i hazards are viewed as m	to list hazards separately eer Lodge and narrows on potential impacts. The ndicating that other nanageable emergencies ough existing LEPC plans. next plan revision, the
Profiling Hazard Events	Requirement §201.6(c)(2)(i):	Appendix D; III-8 to III-11; Appendix B	S		s provided in Appendix D ts. A summary of the

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEW SCORING SYSTEM MET/NOT MET (FOR PREREQU UUNSATISFACTORY NNEEDS IMPROVEMENT	
(3-14)	[The risk assessment shall include a] description of thelocation and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.		available data indicated the greatest property disecond, flooding and wand extent of natural his county is described in the Section C of the plan. Outlined in Appendix B occurrence in the past plan would be enhanced listed in rank order. The investigating critical socrelease sites in the plan. Other data sources that that would enhance the http://www.fema.gov/feFlood Problems for the HAZUS data for 2002 in the county are high has Emergency Action Plan National Dam Safety A Dams at	at are available for reference plan are: or a discussion on Principal County. Indicates that seven dams in zard and that they all have as required by the ct. The National Inventory of mil/nid/webpages/nid.cfm

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)			
Assessing Vulnerability: Overview (Currently found under Identifying Assets section, p.3-18—to be corrected in next version of the Plan Criteria)	Requirement 201.6(c)(2)(ii): [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.	III-8 to III-11	S	Each hazard is assessed a vulnerability and provides a hazard and its impact on th	a summary of each
Assessing Vulnerability: Identifying Assets (3-18)	Requirement 201.6(c)(2)(ii)(A): The plan should describe vulnerability in terms of: The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas	III-8 to III-14; Appendix F	N	A list of vulnerable building provided for floods but not in the plan. In order to recin this section, buildings ar in hazard prone areas, by lidentified. Note: A less than "Satist requirement will not precipassing	for all hazards analyzed eive a satisfactory rating ad infrastructure located hazard type, need to be

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS SCORING SYSTEM MET/NOT MET (FOR PREREQUISITE (S) ONLY) UUNSATISFACTORY NNEEDS IMPROVEMENT OOUTSTANDING
Assessing Vulnerability: Estimating Potential Losses (3-22)	Requirement 201.6(c)(2)(ii)(B): [The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate	Appendix F and Appendix G; III-12 to III-14	A general list of critical facilities is provided in Appendix F. A listing of flood zone buildings with market values is provided in Appendix G. The method used to estimate potential flood losses was based on GIS data of structures in the 100-year and 500-year floodplains, and the CIP plan for bridges was referenced in some. In order to receive a satisfactory rating for this section, potential dollar losses for each hazard type needs to be provided. FEMA 386-2 could be used to estimate the dollar value of the facilities exposed to the flood hazard, and the HAZUS-MH provides estimates of the replacement value of the building stock and infrastructure in Powell County. These overall estimates could be used to develop dollar exposure to County-wide hazards. Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing.
Assessing Vulnerability: Analyzing Development Trends (3-24)	Requirement 201.6(c)(2)(ii)(C): [The plan should describe vulnerability in terms of] providing a general description of land uses and development trends within the community so that mitigation options can be considered in future land use decisions.	III-14	S A description of development trends in the community is provided on page III-14. Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing.

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS SCORING SYSTEM MET/NOT MET (FOR PREREQUISITE (S) ONLY) UUNSATISFACTORY NNEEDS IMPROVEMENT OOUTSTANDING		
Multi-Jurisdictional Risk Assessment (3-26)	Requirement §201.6(c)(2)(iii): For multi-jurisdictional plans, the risk assessment section must assess each jurisdiction's risks where they vary from the risks facing the entire planning area.	Pages III-8 to III-11	S	The plan does a great job hazard and how they vary Deer Lodge. The plan eve of hazards for the County addition, mitigation activiti jurisdictions within the county	between the county and in identifies separate lists versus Deer Lodge. In es highlight specific
MITIGATION STRATEGY (3-29)				Note: Any changes made assessment to address or needs improvement selected in the Mitigation gain final approval of the	previous unsatisfactory scores, will need to be n Strategy section to
Local Hazard Mitigation Goals (3-30)	Requirement §201.6(c)(3)(i): [The hazard mitigation strategy shall include: a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.	Page IV-1	S	Six general mitigation goa order in the plan.	
Identification and Analysis of Mitigation Measures (3-34)	Requirement §201.6(c)(3)(ii): [The mitigation strategy shall include a] section that identifies and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.	Pages IV-2 to IV-5	S	A comprehensive range of identified for each general great job of linking mitigation a table format. Projects conditions for both existing	goal. The plan does a ion projects to the goals identified improve

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORING SYSTEM MET/NOT MET (FOR PREREQUISITE (S) ONLY) UUNSATISFACTORY NNEEDS IMPROVEMENT OOUTSTANDING
Implementation of Mitigation Measures (3-36)	Requirement §201.6(c)(3)(iii): [The mitigation strategy section shall include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization shall include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.	Pages IV-1, V-1, IV-6	Implementation and administration of mitigation projects are discussed on pages IV-1 and V-1 and will be the overall responsibility of the DES Coordinator. Page IV-6 explains the benefit cost review process for projects considered. We suggest that more timeline details be included in the next revision.
Multi-jurisdictional Mitigation Strategy (3-40) PLAN MAINTENANCE PROCEDURES (3-43)	Requirement §201.6(c)(3)(iv): For multi-jurisdictional plans, there must be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.	Pages IV-2 to IV-6; V-1	S Action Items are broken out as either County-wide or specific to Deer Lodge.
Monitoring, Evaluating, and Updating the Plan (3-44)	Requirement §201.6(c)(4)(i): [The plan maintenance process shall include a section describing the] method and	Page V-2	S The plan maintenance process is highlighted under the Plan Implementation and Maintenance section of the plan. The plan will be reviewed on a yearly basis. The DES coordinator will be responsible for coordinating and conducting the plan updates that

PLAN REVIEW CRITERIA REFERENCE (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201 schedule of monitoring,	LOCATION IN THE PLAN (INDICATE SECTION OR ANNEX AND PAGE #)	SCORIN MET/NO UUNSA	/ STATE / FEMA REVIEW IG SYSTEM OT MET (FOR PREREQUATISFACTORY OS IMPROVEMENT will be approved by the	
	evaluating, and updating the mitigation plan within a five-year cycle.			Commissioners with the Before the end of a five plan will be submitted the acceptance.	e assistance of the LEPC. e-year period, the updated to the SHMO and FEMA for
Implementation Through Existing Programs (3-48)	Requirement §201.6(c)(4)(ii): [The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate	Page V-1, III-13	S	mitigation strategies ou	anisms such as the County
Continued Public Involvement (3-50)	Requirement §201.6(c)(4)(iii): [The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.	Page V-2	S	V-2. A series of Public each five-year evaluati provide a forum to expropinions about the plar will be held prior to the Newspapers and radio public of meetings. We submittals state clearly prior to finalizing the five	ress ideas, concerns or n. It is unclear if the meetings five-year plan finalization. will be used to notify the suggest that future that the public can comment re-year plan update.
ADDITIONAL STATE REQUIREMENTS				States that have addi add them in the appro Review Criteria or cre	tional requirements can opriate sections of the Plan eate a new section. States worksheet to record the

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score for those requirements. Insert State Requirement (s)				